

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

NATIONAL ASSOCIATION FOR GUN	)	
RIGHTS, INC., ET AL.,	)	
	)	Case No. 4:23-cv-00830-O
Plaintiffs,	)	
v.	)	
	)	
MERRICK GARLAND,	)	
IN HIS OFFICIAL CAPACITY AS	)	
ATTORNEY GENERAL	)	
OF THE UNITED STATES, ET AL,	)	
	)	
Defendants.	)	
	)	

**PLAINTIFFS' RESPONSE TO DEFENDANTS' CROSS-MOTION FOR SUMMARY  
JUDGMENT**

Consistent with Local Rule 56.4, Plaintiffs file this Response in Opposition to Defendants' Cross-Motion for Summary Judgment. For the reasons set forth in the accompanying brief, *see* Local Rule 56.4(b), Defendants' fail to carry their burden. Plaintiffs also submit the attached appendix in support of this Response.

Date: December 22, 2023

Respectfully submitted,

/s/ Benjamin Sley

Benjamin Sley (TX Bar No. 18500300)  
Whitney A. Davis (TX Bar No. 24084843)  
EGGLESTON KING DAVIS, LLP  
102 Houston Avenue, Suite 300  
Weatherford, TX 76086  
Telephone: (703) 748-2266  
whit@ekdlaw.com  
ben@ekdlaw.com

Jonathan M. Shaw (VA Bar No. 98497)  
Gary M. Lawkowski (VA Bar No. 82329)  
David A. Warrington (VA Bar No. 72293)  
DHILLON LAW GROUP, INC.

2121 Eisenhower Avenue, Suite 608  
Alexandria, VA 22314  
Telephone: (703) 748-2266  
Facsimile: (415) 520-6593  
[jshaw@dhillonlaw.com](mailto:jshaw@dhillonlaw.com)  
[gawlkowski@dhillonlaw.com](mailto:glawkowski@dhillonlaw.com)  
[dwarrington@dhillonlaw.com](mailto:dwarrington@dhillonlaw.com)

Glenn Bellamy (OH Bar No. 0070321)  
WOOD HERRON & EVANS LLP  
600 Vine Street, Suite 2800  
Cincinnati, OH 45202  
Telephone: 513-707-0243  
[gbellamy@whe-law.com](mailto:gbellamy@whe-law.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record in this action.

Date: December 22, 2023

By: /s/ Benjamin Sley  
Benjamin Sley